



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Robert M. Duncan, Treasurer
Republican National Committee - RNC
310 First Street S.E.
Washington, DC 20003

Identification Number: C00003418

JUN 20 2001

Reference: Year End Report (11/28/00-12/31/00)

Dear Mr. Duncan:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses \$10,437.34 of in-kind contributions on Schedule A; however, Schedule B discloses only \$5,218.67 in "offsets" to these in-kind contributions. Be advised, the value of *all* in-kind contributions must be added to the operating expenditures total on Line 21(b) in order to avoid inaccurately inflating the cash-on-hand amount. 11 CFR §104.13(a)(2) Please amend your report to properly disclose all in-kind activity.

-The Detailed Summary Page, on Line 18 Column A of your report, discloses \$2,323,734.53 in transfers from the non-federal account for joint activity for the reporting period. However, Line 21 (a)(ii) Column A discloses \$2,135,671.41 as the non-federal share for joint activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for shared activity, transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission